

EXHIBIT B

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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
 MUNIZ, ELIZA CAMBAY, SAL
 CATALDO, EMIR GOENAGA, JULIAN
 SANTIAGO, HAROLD NYANJOM,
 KELLIE NYANJOM, and SUSAN LYNN
 HARVEY, individually and on behalf of all
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER DENYING
 GOOGLE’S REQUEST FOR ORDER
 COMPELLING PLAINTIFFS TO
 PRODUCE ALL NON-PRIVILEGED,
 RESPONSIVE DOCUMENTS AND
 SERVE PRIVILEGE LOG INCLUDING
 POST-FILING COMMUNICATIONS**

The Honorable Alex G. Tse
 Courtroom A – 15th Floor
 Trial Date: Not Yet Set

[PROPOSED] ORDER

Before the Court is the parties' joint letter brief regarding Google's Request for an Order Compelling Plaintiffs to Produce All Non-Privileged Documents and Serve a Privilege Log including Post-Filing Communications. Having considered the joint letter brief, the Court orders as follows:

First, Google has presented no evidence that Plaintiffs have violated their obligations to produce non-privileged documents responsive to Google's discovery requests. Judicial intervention is also unnecessary. Plaintiffs have further agreed to review Plaintiffs' documents a second time and produce non-privileged documents responsive to Google's expanded interpretations of their discovery requests. Accordingly, Google's request for an order compelling Plaintiffs to produce non-privileged documents is DENIED.

Second, pursuant to the parties' stipulated ESI Order (Dkt. No. 73) the parties are not required to log privileged communications involving trial counsel that post-date July 14, 2020, the date on which the complaint was filed. There is no good cause to modify that stipulation. The Court therefore DENIES Google's request for an order compelling Plaintiffs to log communications between counsel and a plaintiff before that plaintiff appeared in the case.

IT IS SO ORDERED.

DATED: _____

Honorable Alex G. Tse
United States Magistrate Judge